# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors. : (Jointly Administered)

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# AMENDED NOTICE OF MATTERS SCHEDULED FOR HEARING ON APRIL 29, 2010 at 9:45 a.m.

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton U.S. Custom House, before the Honorable Robert E.
Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling

Green, New York, NY 10004-1408

#### I. CONTESTED MATTERS:

A. First Application of Weil, Gotshal & Manges LLP, as Attorneys for the Debtors, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from June 1, 2009 Through September 30, 2009 [Docket No. 4803]

## Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of Weil, Gotshal & Manges LLP [Docket Nos. 5563 and 5564]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

#### Replies Filed:

3. Response of Weil, Gotshal & Manges LLP to Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of Weil, Gotshal & Manges LLP [Docket No. 5600]

- 4. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 5. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]

**Status:** This matter is going forward.

B. First Interim Application of Kramer Levin Naftalis & Frankel LLP, as Counsel for The Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred for the Period from June 3, 2009 Through September 30, 2009 [Docket No. 4459] ("Kramer Fee Application") and Correction and Supplement to the Kramer Fee Application [Docket No. 4715]

#### Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of Kramer Levin Naftalis & Frankel, LLP [Docket No. 5555]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

#### Replies Filed:

- 3. Response to the Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of Kramer Levin Naftalis & Frankel LLP [Docket No. 5629]
- 4. Omnibus Response of Wilmington Trust Company as Indenture Trustee to Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Applications of (A) Kramer Levin Naftalis & Frank LLP; (B) Butzel Long, a Professional Corporation; and (C) FTI Consulting, Inc. [Docket No. 5634]
- 5. Joinder of Law Debenture Trust Company of New York, as Successor Indenture Trustee, to Omnibus Response of Wilmington Trust Company as Indenture Trustee to Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Applications of (A) Kramer Levin Naftalis & Frankel LLP; (B) Butzel Long, a Professional Corporation; and (C) FTI Consulting, Inc. [Docket No. 5636]

- 6. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 7. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]

**Status:** This matter is going forward.

C. Application of Butzel, Long, a Professional Corporation, as Special Counsel to the Official Committee of Unsecured Creditors of Motors Liquidation Company f/k/a General Motors Corporation, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from June 10, 2009 Through September 30, 2009 [Docket No. 4450]

# Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to First Interim Fee Application of Butzel Long [Docket No. 5548]
- Response of the United States Trustee Regarding First Interim Fee
   Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

## Replies Filed:

- 3. Reply of Butzel Long to Fee Examiner's Limited Objection to First Interim Fee Application of Butzel Long [Docket No. 5628]
- 4. Omnibus Response of Wilmington Trust Company as Indenture Trustee to Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Applications of (A) Kramer Levin Naftalis & Frank LLP; (B) Butzel Long, a Professional Corporation; and (C) FTI Consulting, Inc. [Docket No. 5634]
- 5. Joinder of Law Debenture Trust Company of New York, as Successor Indenture Trustee, to Omnibus Response of Wilmington Trust Company as Indenture Trustee to Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Applications of (A) Kramer Levin Naftalis & Frankel LLP; (B) Butzel Long, a Professional Corporation; and (C) FTI Consulting, Inc. [Docket No. 5636]

#### **Additional Documents:**

6. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]

7. Fee Examiner's Summary and Recommendations – First Interim Fee Applications [**Docket No. 5601**]

**Status:** This matter is going forward.

D. First Interim Application of FTI Consulting, Inc. for Allowance of Compensation and Reimbursement of Expenses for Services Rendered in the Case for the Period June 3, 2009 Through September 30, 2009 [Docket No. 4455]

## Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of FTI Consulting, Inc. [Docket No. 5557]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

## Replies Filed:

- 3. Response to the Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of FTI Consulting, Inc. [Docket No. 5616]
- 4. Omnibus Response of Wilmington Trust Company as Indenture Trustee to Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Applications of (A) Kramer Levin Naftalis & Frank LLP; (B) Butzel Long, a Professional Corporation; and (C) FTI Consulting, Inc. [Docket No. 5634]
- 5. Joinder of Law Debenture Trust Company of New York, as Successor Indenture Trustee, to Omnibus Response of Wilmington Trust Company as Indenture Trustee to Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Applications of (A) Kramer Levin Naftalis & Frankel LLP; (B) Butzel Long, a Professional Corporation; and (C) FTI Consulting, Inc. [Docket No. 5636]

#### Additional Documents:

- 6. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 7. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]

**Status:** This matter is going forward.

E. First Application of Honigman Miller Schwartz and Cohn LLP as Special Counsel for the Debtors, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from June 1, 2009 Through September 30, 2009 [Docket No. 4446]

## Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of Honigman Miller Schwartz & Cohn LLP [Docket No. 5544]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

Replies Filed: None to date.

# **Additional Documents:**

- 3. Supplement to First Application of Honigman Miller Schwartz and Cohn LLP as Special Counsel for the Debtors, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from June 1, 2009 Through September 30, 2009 [Docket No. 4503]
- 4. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 5. Fee Examiner's Summary and Recommendations First Interim Fee Applications [Docket No. 5601]

**Status:** This matter is going forward.

F. First Interim Fee Application of Jenner & Block LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses [Docket No. 4451]

### Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of Jenner & Block LLP [Docket No. 5545]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

Replies Filed: None to date.

- 3. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 4. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]

**Status:** This matter is going forward.

G. First and Final Application of Evercore Group L.L.C. for Compensation and Reimbursement of Expenses [Docket No. 4453]

## Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to the Fee Application of Evercore Group, L.L.C. and Motion to Adjourn Fee Application Hearing [Docket No. 5549]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

#### Replies Filed:

3. Reply of Evercore Group L.L.C. to Fee Examiner's Report and Limited Objection to First and Final Fee Application [Docket No. 5635]

#### Additional Documents:

- 4. Fee Examiner's Second Status Report and Advisory [**Docket No. 5463**]
- 5. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]

**Status:** This matter is going forward.

H. First Interim Application of the Claro Group, LLC for Allowance of Compensation and Reimbursement of Expenses for the Period June 1, 2009 Through September 30, 2009 [Docket No. 4506]

## Responses Filed:

1. Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of The Claro Group, LLC [Docket No. 5558]

2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

## **Replies Filed:**

3. Reply of The Claro Group, LLC to the Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of the Claro Group, LLC [Docket No. 5630]

#### Additional Documents:

- 4. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 5. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]

**Status:** This matter is going forward.

I. Fee Examiner's Statement Concerning Fee Application of AP Services [Docket No. 5567]

## **Responses Filed:**

1. Response of AP Services, LLC to the Fee Examiner's Statement Concerning Fee Application of AP Services, LLC [Docket No. 5627]

**Replies Filed:** None to date.

#### **Additional Documents:**

- 2. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 3. Fee Examiner's Summary and Recommendations First Interim Fee Applications [Docket No. 5601]
- 4. Report by AP Services, LLC of Compensation Earned and Expenses Incurred for the Period from June 1, 2009 Through August 31, 2009 [Docket No. 4280]
- 5. Report by AP Services, LLC of Compensation Earned and Expenses Incurred for the Period from September 1, 2009 Through November 30, 2009 [Docket No. 4828]

6. Report by AP Services, LLC of Compensation Earned and Expenses Incurred for the Period from December 1, 2009 Through February 28, 2010 [Docket 5505].

**Status:** This matter is going forward.

J. Fee Examiner's Motion for Clarification of Appointment Order [Docket No. 5483]

#### Responses Filed:

1. Objection of Debtors to Fee Examiner's Motion for Clarification of Appointment Order [Docket No. 5596]

Replies Filed: None to date.

#### Additional Documents:

2. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]

**Status:** This matter is going forward.

K. Fee Examiner's Application to Authorize the Extended Retention and Employment of the Stuart Maue Firm as Consultant to the Fee Examiner as of March 8, 2010 [Docket No. 5431]

#### Responses Filed:

1. Response of Debtors to Fee Examiner's Application to Authorize Extended Retention of the Stuart Maue Firm as Consultant to the Fee Examiner as of March 8, 2010 [Docket No. 5522]

#### Replies Filed:

2. Fee Examiner's Supplemental Statement in Support of Pending Application to Authorize the Extended Retention and Employment of the Stuart Maue Firm as Consultant to the Fee Examiner as of March 8, 2010 [Docket No. 5593]

3. Endorsed Order signed on 4/21/2010 re: Fee Examiner's Application to Authorize the Extended Retention and Employment of the Stuart Maue Firm as Consultant to the Fee Examiner as of March 8, 2010 [Docket No. 5537]

**Status:** This matter is going forward.

L. Status conference regarding the Order Pursuant to 11 U.S.C. §§ 327(a) and 330 Authorizing the Debtors to Amend the Terms of Their Engagement with Brownfield Partners, LLC [Docket No. 5313]

Responses Filed: None to date.

Replies Filed: None to date.

#### **Additional Documents:**

- 1. Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. §§ 327(a) and 330 Authorizing the Debtors to Amend the Terms of their Engagement with Brownfield Partners, LLC [**Docket No. 5207**]
- M. Request for Leave to File Claim [**Docket No. 5178**] and Request for Relief from Automatic Stay [**Docket No. 5179**], filed by Lisa Gross.

## Responses Filed:

 Debtors' Consolidated Opposition to (i) Request of Lisa Gross for Relief from the Automatic Stay and (ii) Request for Relief to File Claim [Docket No. 5379]

#### Replies Filed:

- 2. Reply of Lisa Gross to Debtors' Consolidated Opposition [**Docket No. 5440**]
- 3. Additional Reply of Lisa Gross to Debtors' Consolidated Opposition [Docket No. 5575]

Additional Documents: None to date.

**Status:** This matter is going forward.

## N. Second Interim Fee Applications

- Second Interim Fee Application of Jenner & Block LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses [Docket No. 5263]
- 2. Second Interim Application of LFR Inc. for Allowance of Compensation and for Reimbursement of Expenses Rendered in the Case for the Period October 1, 2009 Through January 31, 2010 [Docket No. 5270]
- 3. Second Interim Application of FTI Consulting, Inc. for Allowance of Compensation and for Reimbursement of Expenses for Services Rendered in the Case for the Period October 1, 2009 Through January 31, 2010 [Docket No. 5279]
- 4. Second Interim Application of Jones Day, Special Counsel to the Debtors and Debtors-in-Possession, Seeking Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses for the Period from October 1, 2009 Through January 31, 2010 [Docket No. 5285]
- 5. Second Interim Application of the Claro Group, LLC for Allowance of Compensation and Reimbursement of Expenses for the Period October 1, 2009 Through January 31, 2010 [Docket No. 5290]
- 6. Second Interim Application of Brownfield Partners, LLC as Environmental Consultants to the Debtors for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2009 Through January 31, 2010 [Docket No. 5291]
- 7. Second Application of Butzel Long, A Professional Corporation, as Special Counsel to the Official Committee of Unsecured Creditors of Motors Liquidation Company, f/k/a General Motors Corporation, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from October 1, 2009 Through January 31, 2010 [Docket No. 5293]
- 8. First Application of Plante & Moran, PLLC, as Accountants for the Debtors, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from October 9, 2009 Through January 31, 2010 [Docket No. 5294]
- 9. Second Application of Weil, Gotshal & Manges LLP, as Attorneys for the Debtors, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from October 1, 2009, Through January 31, 2010 [Docket no. 5295]

 Second Interim Application of Kramer Levin Naftalis & Frankel LLP, as counsel for the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred for the Period from October 1, 2009 Through January 31, 2010 [Docket No. 5296]

## Responses Filed:

11. Fee Examiner's Motion for Adjournment of Hearing on Second Interim Fee Applications [Docket No. 5540]

## Replies Filed:

12. Response of Weil, Gotshal & Manges LLP to Fee Examiner's Motion for Adjournment on Second Interim Fee Applications [Docket No. 5590]

Additional Documents: None to date.

**Status:** This matter is going forward.

#### II. UNCONTESTED MATTERS:

A. First Interim Application of Jones Day, Special Counsel to the Debtors and Debtors-in-Possession, Seeking Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses for the Period from June 1, 2009 Through September 30, 2009 [Docket No. 4448]

## Responses Filed:

- 1. Fee Examiner's Report and Statement of No Objection to the First Interim Fee Application of Jones Day [Docket No. 5546]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

Replies Filed: None to date.

#### **Additional Documents:**

- 3. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 4. Fee Examiner's Summary and Recommendations First Interim Fee Applications [Docket No. 5601]

**Status:** This matter is going forward.

B. Final Application of Alan Chapell, Consumer Privacy Ombudsman, Appointed Pursuant to Section 332 of the Bankruptcy Code for Final Approval and Allowance of Compensation for Services Rendered During the Period From June 8, 2009 Through and Including October 4, 2009 [Docket No. 4456]

## Responses Filed:

- 1. Fee Examiner's Statement of No Objection to the Final Application of Alan Chappell [Docket No. 4990]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

Replies Filed: None to date.

### Additional Documents:

- 3. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 4. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]

**Status:** This matter is going forward.

C. Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation (the "**Debtors' ADR Motion**") [**Docket No. 4780**]

## Responses Filed: Seventeen in total.

- Statement of the Official Committee of Unsecured Creditors in Support of the Debtors' Motion for an Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation filed by Amy Caton on behalf of Official Committee of Unsecured Creditors of General Motors Corporation [Docket No. 4942]
- 2. Texas Comptroller's Response to Debtors' Motion Regarding Alternative Dispute Resolution Procedures filed by Mark Edwin Browning on behalf of Texas Comptroller of Public Accounts [Docket No. 4860] (the "Texas Response")
- 3. State of Washington Joinder in Objection of Texas to ADR Procedures filed by Zachary Mosner on behalf of Washington State Tax Agencies [Docket No. 4869] (the "Washington Response")

- 4. Commonwealth of Pennsylvania, Department of Revenue Joinder in Texas Comptroller's Response to Debtors' Motion Regarding Alternative Dispute Resolution Procedures filed by Carol E. Momjian on behalf of Commonwealth of Pennsylvania, Department of Revenue [Docket No. 4920] (the "Pennsylvania Response")
- 5. State of Michigan Joinder in Texas Comptroller's Response to Debtors' Motion Regarding Alternative Dispute Resolution Procedures filed by Julius O. Curling on behalf of State of Michigan, Department of Treasury [Docket No. 4921] (the "Michigan Response")
- 6. Objection of Designated Claimant to Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation filed by Jake W. Rodd [Docket No. 4925 & 5001] (the "Rodd Responses")
- 7. Opposition of Town of Salina, New York to Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. §105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures Including Mandatory Mediation filed by Lee E. Woodard on behalf of Town of Salina [Docket No. 4927] (the "Salina Response")
- 8. Response of Atlas Technologies, Inc. to Debtors' request for the entry of an Order pursuant to 11 USC § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, including Mandatory Mediation filed by Barry M. Lasky on behalf of Atlas Technologies, Inc. [Docket No. 4931] (the "Atlas ADR Response")
- 9. Limited Objection of Andorra Banc Agricol Reig, S.A. to Motion of Debtors for Entry of Order Pursuant to 11 U.S.C §105(A) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Arbitration filed by Samuel Jason Teele on behalf of Andorra Banc Agricol Reig, S.A. [Docket No. 4934] (the "Andorra Response")
- 10. Limited Objection of Detroit Diesel Corporation to Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. § 105(A) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation filed by Michael T. Conway on Behalf of Detroit Diesel Corporation [Docket No. 4936] (the "Detroit Diesel Response")
- 11. Objection of Bright Bay GMC Truck, Inc. to Debtors' Motion for Alternative Dispute Resolution Procedures filed by Jeffrey Bard on behalf

- of Bright Bay GMC Truck, Inc. [Docket No. 4937] (the "Bright Bay Response")
- 12. Limited Objection of the Dex-Cool and Anderson Class Claimants to Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. § 105(A) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation (Docket # 4780) filed by Paul A. Rachmuth on behalf of Dex-Cool/Gasket Class Action and Anderson Class Action Classes [Docket No. 4938] (the "Dex-Cool and Anderson Response")
- 13. Limited Objection of Ad Hoc Committee of Consumer Victims of General Motors to the Debtors' Motion for Entry of an Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation filed by Benjamin P. Deutsch on behalf of Ad Hoc Committee of Consumer Victims of General Motors [Docket No. 4940] (the "Ad Hoc Committee Response")
- 14. D&M Real Estate, LLC t/a The Horse Tavern & Grill and The Horse, Inc. t/a the Horse Tavern & Grill's Response in Objection to Debtors' Motion Regarding Alternative Dispute Resolution Procedures (Affirmation in Support of D&M Real Estate, LLC, T/A The Horse Tavern & Grill and The Horse, Inc., T/A The Horse Tavern & Grill's Motion for Relief from Automatic Stay) filed by William Dirk Pastorick on behalf D&M Real Estate, LLC t/a The Horse Tavern & Grill and The Horse, Inc. t/a the Horse Tavern & Grill [Docket No. 4943] (the "D&M Response")
- 15. Ohio Department of Taxation's Joinder in Texas Comptroller's Response to Debtors' Motion Regarding Alternative Dispute Resolution Procedures filed by Victoria D. Garry on behalf of Ohio Department of Taxation [Docket No. 4944] (the "Ohio Response")
- 16. City of Anderson's Objection to Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. 105(A) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures Including Mandatory Mediation filed by Ann Marie Bauer on behalf of City of Anderson [Docket No. 4997] (the "Anderson Response")
- 17. Onondaga's Objection to the Debtors' Motion Seeking Authorization to Implement ADR Procedures filed by Kevin C. Murphy on behalf of Onondaga [Docket No. 4999] (the "Onondaga Response")

#### Replies Filed:

18. Omnibus Reply of the Debtors to Objections to Debtors' Motion for Entry of Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution

Procedures, Including Mandatory Mediation [Docket No. 4957] (the "Debtors' Omnibus Reply")

#### **Additional Documents:**

19. Supplement to Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation [Docket No. 4911]

**Status**:

This matter is going forward. On February 23, 2010, the Court entered an Order (the "ADR Order") approving the Debtors' ADR Motion with respect to certain types of claims and adjourning to April 29, 2010 the Adjourned Subject Claims. The Debtors have been able to resolve all outstanding objections, as set forth in a proposed order supplementing the ADR Order (the "Supplemental ADR Order"), and this matter is going forward on an uncontested basis. Among other things, the Debtors' proposed Supplemental ADR Order excludes from the ADR Procedures the following types of claims: (a) asbestos-related claims (including indemnity claims relating to asbestos liability); (b) environmental claims that constitute prepetition unsecured claims (including claims for damages arising from the rejection of executory contracts that relate primarily to environmental matters); (c) tax claims (excluding tax indemnity claims relating to leveraged fixed equipment lease transactions); and (d) patent infringement claims.

D. Debtors' Twelfth Omnibus Objection to Claims (Workers' Compensation Claims) [Docket No. 5326]

Responses Filed: None to date.

Replies Filed: None to date.

Additional Documents: None to date.

**Status:** This matter is going forward.

E. Debtors' Objection to Proof of Claim No. 65796 Filed by Rudolph V. Towns [Docket No. 5384]

Responses Filed: None to date.

Replies Filed: None to date.

<sup>&</sup>lt;sup>1</sup> All capitalized terms used in this section of the Agenda shall have the meanings ascribed to such terms in the ADR Order.

Additional Documents: None to date.

**Status:** This matter is going forward.

F. Application of the Official Committee of Unsecured Creditors of Motors Liquidation Company for Entry of an Order Authorizing the Employment and Retention of Bates White, LLC as the Committee's Consultant on the Valuation of Asbestos Liabilities *Nunc Pro Tunc* to March 16, 2010 [Docket No. 5480]

Responses Filed: None to date.

Replies Filed: None to date.

<u>Additional Documents</u>: None to date.

**Status:** This matter is going forward.

#### III. ADJOURNED MATTERS:

A. General Motors LLC's Motion (I) for Declaratory Relief Regarding the Status of a Certain Sublease or, in the Alternative, Relief from the Assumption and Assignment of a Certain Sublease to GM Pursuant to Rule 60(b) and (II) to Rescind the Agreement to Resolve Objection to Cure Notice Between GM and Knowledge Learning Corporation Dated August 14, 2009 ("New GM's Reconsideration Motion") [Docket No. 4895]

## Responses Filed:

1. Knowledge Learning Corporation's Response to New GM's Reconsideration Motion [**Docket No. 5405**]

### Replies Filed:

2. General Motors LLC's Reply to Knowledge Learning Corporation's Response to New GM's Reconsideration Motion [Docket No. 5595]

## **Additional Documents:**

- Statement Regarding New GM's Reconsideration Motion [Docket No. 5598]
- 4. Statement Regarding New GM's Reconsideration Motion [**Docket No.** 5603]

**Status:** This matter has been adjourned to May 27, 2010 at 9:45 a.m.

B. First Interim Application of LFR Inc., for Allowance of Compensation and for Reimbursement of Expenses for Services Rendered in the Case for the Period June 1, 2009 Through September 30, 2009 [Docket No. 4436]

## Responses Filed:

- 1. Fee Examiner's Preliminary Report on the First Interim Fee Application of LFR Inc [Docket No. 5566]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

Replies Filed: None to date.

#### Additional Documents:

- 3. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 4. Stipulation and Order for Adjournment of April 29, 2010 Hearing on First Interim Fee Application of LFR Inc. [Docket No. 5560]
- 5. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]

Status: This matter will be adjourned to a date to be determined at the hearing on April 29, 2010 at 9:45 a.m.

C. First Interim Application of Baker & McKenzie for Compensation and Reimbursement of Expenses for Services Rendered as Special Counsel for the Debtors for the Period June 1, 2009 Through September 30, 2009 [Docket No. 4454]

#### Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of Baker & McKenzie LLP[Docket No. 5543]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

Replies Filed: None to date.

- 3. Fee Examiner's Second Status Report and Advisory [Docket No. 5463]
- 4. Fee Examiner's Summary and Recommendations First Interim Fee Applications [**Docket No. 5601**]
- 5. Stipulation and Order for Adjournment of April 29, 2010 Hearing on First Interim Fee Application of Baker & McKenzie LLP [Docket No. 5604]

Status: This matter will be adjourned to a date to be determined at the hearing on April 29, 2010 at 9:45 a.m.

D. First Interim Fee Application of Brownfield Partners, LLC as Environmental Consultants to the Debtors for Allowance of Compensation and Reimbursement of Expenses for the Period from June 1, 2009 Through September 30, 2009 [Docket No. 4457]

# Responses Filed:

- 1. Fee Examiner's Preliminary Report on the First Interim Fee Application of Brownfield Partners LLC [Docket No. 5565]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

Replies Filed: None to date.

#### Additional Documents:

3. Stipulation and Order for Adjournment of April 29, 2010 Hearing on First Interim Fee Application of Brownfield Partners, LLC [Docket No. 5559]

**Status:** This matter will be adjourned to a date to be determined at the hearing on April 29, 2010 at 9:45 a.m.

E. Motion of Plaintiffs in the Action Entitled *Freidman v. General Motors Corp.*, 08 CIV 2458 (SAS) for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) [**Docket No. 2759**]

Responses Filed: None to date.

Replies Filed: None to date.

Additional Documents: None to date.

**Status:** This matter has been adjourned to May 27, 2010 at 9:45 a.m.

F. Application of the Brittinghams for an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Believed to Have Knowledge of the Relevant Matters [**Docket No. 3665**]

Responses Filed: None to date.

Replies Filed: None to date.

Additional Documents: None to date.

**Status:** This matter has been adjourned to May 27, 2010 at 9:45 a.m.

G. Application of Remy International, Inc. for an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Believed to Have Knowledge of the Relevant Matters [Docket No. 3770]

Responses Filed: None to date.

Replies Filed: None to date.

#### Additional Documents:

1. Application for an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Believed to Have Knowledge of the Relevant Matters [Docket No. 3769]

**Status:** This matter has been adjourned to May 27, 2010 at 9:45 a.m.

H. Debtors' Third Omnibus Motion Pursuant to 11 U.S.C. § 365 to Reject Certain Unexpired Leases of Nonresidential Real Property [**Docket No. 4105**]

Responses Filed: None to date.

Replies Filed: None to date.

Additional Documents: None to date.

**Status:** This matter is adjourned to May 27, 2010 at 9:45 a.m. with respect

to the contract counterparty Wilmington Trust Company, Verizon

Capital Corp. / Bell Atlantic TriContinental Leasing Corp.

I. Motion of Shreveport Red River Utilities, LLC for Allowance and Payment of Post Petition Claim and Motion to Enforce Adequate Assurance of Payment Agreement Pursuant to 11 U.S.C. § 366(c) [Docket No. 4527]

Responses Filed: None to date.

Replies Filed: None to date.

Additional Documents: None to date.

**Status:** This matter has been adjourned to May 27, 2010 at 9:45 a.m.

J. Deutsche Bank AG's Motion for Relief from Automatic Stay to Effect Setoff [Docket No. 4529]

Responses Filed: None to date.

Replies Filed: None to date.

Additional Documents: None to date.

**Status:** This matter has been adjourned to June 15, 2010 at 9:45 a.m.

K. Zinn Company, Inc.'s Motion to Compel Debtors to Comply with Payment Obligations Under Wind-Down Agreement ("Zinn's Motion to Compel") [Docket No. 5104]

Responses Filed:

1. Debtors' Response to Zinn's Motion to Compel [Docket No. 5386]

Replies Filed: None to date

Additional Documents: None to date.

**Status:** This matter has been adjourned to May 27, 2010 at 9:45 a.m.

L. Pretrial conference in *Motors Liquidation Company v. MCM Management Corp.*, Adversary Proceeding No. 10-05008 (REG) (Bankr. S.D.N.Y. 2010)

**Status:** This matter has been adjourned to May 27, 2010 at 9:45 a.m.

M. Debtors' First Omnibus Objection to Claims (Amended and Superseded Claims) [Docket No. 4622]

## Responses Filed:

1. Response of Del Norte Chevrolet-Olds and Larry Allen to Debtors' First Omnibus Objection [Docket No. 4778] (the "Del Norte Response")

Replies Filed: None to date.

#### Additional Documents:

2. Order Granting Debtors' First Omnibus Objection to Claims (Amended and Superseded Claims) [Docket No. 4806]

**Status:** This matter is adjourned to May 27, 2010 at 9:45 a.m.

N. Debtors' Third Omnibus Objection to Claims (Duplicate Claims) [**Docket No.** 4624]

#### Responses Filed:

- Response of Liberty Mutual Insurance Company to Debtors' Third Omnibus Objection to Claims (Duplicate Claims) [Docket No. 4752]
- 2. Response of ILCO Site Remediation Group to Debtor's Third Omnibus Objection to Claims (Duplicate Claims) [Docket No. 4762]
- 3. Response of Sharyl Y. Carter to Debtor's Third Omnibus Objection to Claims (Duplicate Claims) [**Docket Nos. 4771, 4772, and 4773**]

Replies Filed: None to date.

#### Additional Documents:

- 4. Order Granting Debtors' Third Omnibus Objection to Claims (Duplicate Claims) [Docket No. 4808]
- 5. Notice of Withdrawal of Debtors' Third Omnibus Objection to Claims Solely with Respect to Proof of Claim No. 20950 filed by Liberty Mutual Insurance Company [Docket No. 4891]

**Status:** This matter is adjourned to May 27, 2010 at 9:45 a.m.

## IV. WITHDRAWN MATTERS:

A. First Interim Fee Application of Lowe, Fell & Skogg, LLC for Services Rendered for the Period of June 1, 2009 Through July 10, 2009 [Docket No. 4474]

## Responses Filed:

- 1. Fee Examiner's Report and Statement of Limited Objection to the First Interim Fee Application of Lowe, Fell & Skogg LLC [Docket No. 5547]
- 2. Response of the United States Trustee Regarding First Interim Fee Applications for Compensation and Reimbursement of Expenses [Docket No. 5568]

Replies Filed: None to date.

#### Additional Documents:

3. Notice of Withdrawal of First Application of Lowe, Fell & Skogg, LLC as Attorneys for the Debtors, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from June 1, 2009, Through July 10, 2009 [Docket No. 5376]

**Status:** This matter has been withdrawn.

B. Motion of Plaintiffs in the Action Entitled *Sidner et al. v. General Motors Corporation*, for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) [**Docket No. 4775**]

Responses Filed: None to date.

Replies Filed: None to date.

## Additional Documents:

1. Notice of Withdrawal of Motion for Entry of an Order Granting Relief from the Automatic Stay [Docket No. 5585]

**Status:** This matter has been withdrawn.

C. Motion of Plaintiffs in the Action Entitled *Paikai et al. v. General Motors Corporation*, for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) [**Docket No. 4776**]

Responses Filed: None to date.

Replies Filed: None to date.

## Additional Documents:

1. Notice of Withdrawal of Motion for Entry of an Order Granting Relief from the Automatic Stay [Docket No. 5587]

**Status:** This matter has been withdrawn.

D. Motion of Plaintiffs in the Action Entitled O'Connor et al. v. General Motors Corporation, for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) [Docket No. 4777]

Responses Filed: None to date.

Replies Filed: None to date.

# Additional Documents:

1. Notice of Withdrawal of Motion for Entry of an Order Granting Relief from the Automatic Stay [Docket No. 5589]

**Status:** This matter has been withdrawn.

Dated: April 28, 2010

New York, New York

/s/ Joseph H. Smolinsky Harvey R. Miller Stephen Karotkin

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